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February 15, 2022

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Annual Review of Purchased Gas Adjustment and Gas Purchasing Policies of
Piedmont Natural Gas Company, Incorporated (For Potential Increase or Decrease
in Gas Adjustment)
Docket No. 2022-4-G

Dear Ms. Boyd:

The Clerk's Office for the Public Service Commission of South Carolina ("Commission") issued a Prefile Testimony Letter in the above-referenced docket on February 4, 2022, which includes a June 24, 2022 deadline for filing a motion to prefile surrebuttal testimony. The directive issued by the Commission in Docket No. 2021-291-A on January 27, 2022, setting forth this procedure for surrebuttal testimony indicated it went into effect immediately when the Clerk's Office is developing a procedural schedule where prefiled testimony is anticipated. Subsequent Order No. 2022-58 issued February 10, 2022, indicated likewise. However, the procedural schedule for this docket was established prior to January 27, 2022, through Order No. 2021-57 issued in Docket No. 2005-83-A after the Commission held a virtual forum and received written comments regarding possible modifications to procedural schedules for annual fuel and purchased gas adjustment proceedings. The procedural schedule established in Order No. 2021-57 includes a surrebuttal testimony deadline. It does not contain a deadline or requirement for filing a motion to prefile surrebuttal testimony. Except for the motion to prefile surrebuttal testimony deadline, the remaining dates in the February 4, 2022 Prefile Testimony Letter match those in Exhibit A to Order No. 2021-57.¹ The South Carolina Office of Regulatory Staff ("ORS") respectfully requests that the requirement to file and the deadline for filing a motion to prefile surrebuttal testimony be

¹ Exhibit A to Order No. 2021-57 contains a scrivener's error regarding this docket. It lists the surrebuttal deadline as June 20, 2022, and the rebuttal deadline as June 23, 2022. The surrebuttal deadline should be listed as June 30, 2022.

removed from the procedural schedule for this docket because the schedule was established prior to the issuance of Order No. 2022-58 and the directive upon which the Order is based.

If this request to remove the deadline is denied and reserving all rights to seek reconsideration of Order No. 2022-58, ORS asks that the other testimony deadlines in this docket be revised to allow time for the process described in Order No. 2022-58. A requirement to file and obtain a ruling on a motion to prefile surrebuttal testimony was not contemplated at the time the schedules set forth in Order No. 2021-57 were established. A deadline of one day after rebuttal is due for a motion for leave to file surrebuttal is unreasonable and prejudicial, as there must be adequate time for reviewing the rebuttal testimony, determining whether to request to file surrebuttal, and then preparing a motion for leave to file that explains the basis for the motion. Further, the seven days between the rebuttal deadline and surrebuttal deadline in the current schedule is not sufficient for the motions process, a ruling on the motion, and the filing of surrebuttal testimony to all take place.

Counsel for ORS has discussed this matter with counsel for Piedmont Natural Gas Company, Inc. Piedmont consents to removal of the requirement to file and the deadline for filing a motion to prefile surrebuttal testimony from the procedural schedule for this docket.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Huber", written in a cursive style.

Christopher M. Huber

cc: All Parties of Record (via E-mail)
C. Jo Anne Wessinger Hill, Esquire (via E-mail)
David Butler, Esquire (via E-mail)